

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

JGIAP RH 160 LLC

Plaintiff,

vs.

CRI HOLDING CORP., TOURAJ  
NAGHIEH, MORALI AND ASSOCIATES,  
ANTHONY MORALI, JOSEPH MORALI,  
MANDA INTERNATIONAL  
CORPORATION, STRIKEFORCE  
MECHANICAL CORPORATION, AND  
ANGELO CORRAO

Defendants.

Case No. 1:21-cv-2489-DG-JRC

**Judge Diane Gujarati**

**Magistrate Judge James R. Cho**

**JOINT STATUS REPORT**

PLEASE TAKE NOTICE that Plaintiff and Defendants (collectively, “the Parties”), by and through their undersigned counsel, file this Joint Status Report pursuant to the Court’s Order dated October 19, 2021.

On October 4, 2021, all parties participated in a court mandated settlement conference before Magistrate Judge James R. Cho. The parties were unsuccessful in coming to any settlement in this matter.

On October 19, 2021, all parties participated in a follow up settlement conference before Magistrate Judge James R. Cho. The parties again were unsuccessful in coming to any agreement on settlement.

On October 19, 2021, the Court ordered the parties to continue discussing settlement privately and to inform the Court of settlement status.

At this time, the parties do not believe that further settlement discussions would be productive and ask that the Court renew the defendants' pre-motion conference letters.

Respectfully submitted this 19<sup>th</sup> day of November, 2021.

ARMSTRONG TEASDALE LLP

By: /s/ Ryan M. Wilson  
Ryan M. Wilson, Esq.  
919 Third Avenue, 37<sup>th</sup> Floor  
New York, NY 10022  
(212) 209-4400  
[rwilson@atllp.com](mailto:rwilson@atllp.com)

Nicholas R. Peppler, (*pro hac vice*)  
4643 S. Ulster Street, Ste. 800  
Denver, CO 80237  
(720) 200-0676  
[npeppler@atllp.com](mailto:npeppler@atllp.com)

ATTORNEYS FOR PLAINTIFF JGIAP RH  
160 LLC

MARK S. FRIEDLANDER

By: /s/ Mark S. Friedlander  
Mark S. Friedlander, Esq.  
101 Lafayette Street, 10<sup>th</sup> Floor  
New York, NY 10013  
(212) 962-2877  
[Msfesg47@aol.com](mailto:Msfesg47@aol.com)

ATTORNEY FOR DEFENDANT CRI  
HOLDING CORP.

MILMAN LABUDA LAW GROUP PLLC

By: /s/ Michael J. Mauro  
Michael J. Mauro, Esq.  
Emanuel Kataev, Esq.  
Kyle F. Monaghan, Esq.  
3000 Marcus Avenue, Suite 3W8  
Lake Success, NY 11042-1073  
(516) 328-8899  
[michael@mllaborlaw.com](mailto:michael@mllaborlaw.com)  
[emanuel@mllaborlaw.com](mailto:emanuel@mllaborlaw.com)  
[kyle@mllaborlaw.com](mailto:kyle@mllaborlaw.com)

ATTORNEYS FOR DEFENDANTS MANDA  
INTERNATIONAL CORP, STRIKEFORCE  
MECHANICAL CORP., ANGELO CORRAO

DONOVAN HATEM LLP

By: /s/ Scott K. Winikow  
Scott K. Winikow, Esq.  
112 W. 34<sup>th</sup> Street, 18<sup>th</sup> Floor  
New York, NY 10120  
(212) 244-3333  
[swinikow@optonline.net](mailto:swinikow@optonline.net)

ATTORNEY FOR DEFENDANTS ANTHONY  
MORALI ARCHITECT, PLLC i/s/h/a/  
MORALI AND ASSOCIATES, ANTHONY  
MORALI, JOSEPH MORALI